



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 24, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Dalton Telephone Company, Inc.  
Study Area Code 371537**

Dear Ms. Dortch:

On behalf of Dalton Telephone Company, Inc. ("Dalton"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Dalton seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 24, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58**  
**2015 ETC Annual Report of Dalton Telephone Company, Inc.**  
**Study Area Code 371537**  
**Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Dalton Telephone Company, Inc. (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	371537
<015> Study Area Name	DALTON TEL CO, INC
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	David Shipley
<035> Contact Telephone Number: Number of the person identified in data line <030>	8665426779 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	dshipley@ghvalley.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div>371537ne510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div>371537ne610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div></div>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

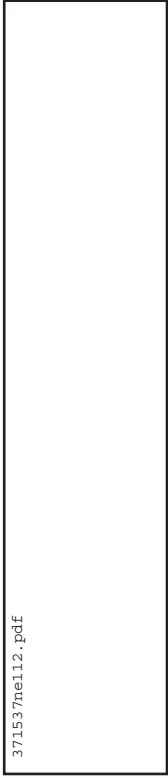
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@ghvalley.net
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes / no )         </div> <div> <input type="radio"/> (yes / no )         </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO., INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@ghvalley.net

[illegible]





FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

371537
DALTON
2016
David
866542
dshipl

-- See attached worksheet --



(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@ghvalley.net

<910>	Tribal Land(s) on which ETC Serves	
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<920>	Tribal Government Engagement Obligation	
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Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select Yes or No or Not Applicable

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

<b>(1100) No Terrestrial Backhaul Reporting</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@ghvalley.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@dhvalley.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

✓

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,

✓

<1222> Details on the number of minutes provided as part of the plan,

✓

<1223> Additional charges for toll calls, and rates for each such plan.

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shiprey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshiprey@nvalley.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

<2010>	Incremental Connect America Phase I reporting	
<2011a>	2nd Year Certification {47 CFR § 54.313(b)(1)i}	
<2011a>	3rd Year Certification {47 CFR § 54.313(b)(1)ii}	
<2011b>	Attachment {47 CFR § 54.313(b)(1)ii}	

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

<2012>	2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}	
<2013>	2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}	
<2014>	2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}	
<2015>	2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}	

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

Certification Support Used to Build Broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017>	3rd year Broadband Service Certification	
<2018>	5th year Broadband Service Certification	
<2019>	Interim Progress Certification	

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021>	Interim Progress Community Anchor Institutions	
--------	--	--

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	
Data Collection Form	
FCC Form 481	
OMB Control No. 3060-0986/OMB Control No. 3060-0819	
July 2013	

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO. INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@chvalley.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan	
	Milestone Certification (47 CFR § 54.313(f)(1)(ii))	371537ne3010.pdf

(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input checked="" type="checkbox"/>
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(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	371537ne3012.pdf
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(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="checkbox"/>
(3014)	If yes, does your company file the RUS annual report	<input checked="" type="checkbox"/>

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>

(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
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(3018)	If the response is no on line 3014, Is your company audited?	<input checked="" type="checkbox"/>
--------	--	-------------------------------------

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input checked="" type="checkbox"/>
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(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>
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(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit	<input checked="" type="checkbox"/>
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If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>
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(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
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(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
--------	---	--------------------------

(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
--------	---	--------------------------

(3026)	Attach the worksheet listing required information	371537ne3026.pdf
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Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO. INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@chvalley.net

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends




<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@ghvalley.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	371537
<015> Study Area Name	DALTON TEL CO, INC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	David Shipley
<035> Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dshipley@ghvalley.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>Dee Dee Longenecker</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Dee Dee Longenecker</u>
Name of Reporting Carrier:	<u>DALTON TEL CO, INC</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/24/2015</u>
Printed name of Authorized Officer:	<u>David Shipley</u>
Title or position of Authorized Officer:	<u>Vice President</u>
Telephone number of Authorized Officer:	<u>8665426779 ext.</u>
Study Area Code of Reporting Carrier:	<u>371537</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>DALTON TEL CO, INC</u>
Name of Authorized Agent or Employee of Agent:	<u>Dee Dee Longenecker</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/24/2015</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Dee Dee Longenecker</u>
Title or position of Authorized Agent or Employee of Agent:	<u>Manager - Regulatory Affairs</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5123380473 ext.</u>
Study Area Code of Reporting Carrier:	<u>371537</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

**DALTON TELEPHONE COMPANY**

**STUDY AREA CODE 371537**

**RESPONSE TO LINE 510 - SERVICE QUALITY STANDARDS**

**AND CONSUMER PROTECTION RULES COMPLIANCE  
(Voice and Broadband)**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Dalton Telephone Company (“Dalton”) hereby certifies that its voice service complies with applicable service quality standards and consumer protection rules. Dalton complies with consumer protection obligations under Nebraska state law. Specifically, Nebraska Consumer Protection Act, Nebraska Revised Statute § 59-1601, and the Nebraska Uniform Deceptive Trade

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

Practices Act, Nebraska Revised Statute § 87-301. The Consumer Protection Act outlaws unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade of commerce. The Uniform Deceptive Trade Practices Act enumerates particular trade practices that violate the statute and prohibits unconscionable acts or practices by a supplier in connection with a consumer transaction.

Dalton also complies with the Nebraska Administrative Code, Title 291 Nebraska Public Service Commission, Chapter 5 Telecommunications Rules and Regulations. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff which discloses rates, and terms and conditions of service to customers (2) adherence to Quality of Service Standards, (3) conforming to Customer Billing standards and (4) addressing Customer Complaints. Dalton submits annually to the Nebraska Public Service Commission data pertaining to Complaints (§ 009.04A4) and Consumer Protection/Service Quality Standards (§ 009.04A5).

Dalton is also subject to federal truth-in-billing requirements, has implemented CPNI and Red Flag Rules policies, and is complying with other applicable federal and state requirements governing the protection of customers' privacy.

Dalton is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 *Open Internet Order* when it becomes effective.

**DALTON TELEPHONE COMPANY**

**STUDY AREA CODE 371537**

**RESPONSE TO LINE 610 – ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

**(Voice and Broadband)**

Dalton Telephone Company (“The Company”) hereby certifies that it is able to function in emergency situations as set forth in §54.201(a)(2).<sup>1</sup> The Company’s voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery back-up at all office locations and in its electronic equipment sites. The Company’s standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation. The length of run time is determined by the equipment serving the area and the number of customers supported by the equipment.

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<sup>1</sup> Section 54.201(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext..
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@qhvalley.net

1/1/2015
20.59

	Residential Local Service Charge Effective Date
<701>	Single State-wide Residential Local Service Charge
<702>	

<703>

[illegible]



(710) Broadband Price Offerings  
Data Collection Form  
FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	371537
<015>	Study Area Name	DALTON TEL CO, INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	David Shipley
<035>	Contact Telephone Number - Number of person identified in data line <030>	8665426779 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dshipley@ghvalley.net

[illegible]

REDACTED FOR PUBLIC INSPECTION

[illegible]

## **Dalton Telephone Company**

**Study Area Code: 371537**

### **Rates, Terms and Conditions for Lifeline Service**

**(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Dalton Telephone Company's tariff(s) on file with the Nebraska Public Service Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:<sup>(1)(2)</sup>

<b>Exchange Name</b>	<b>R-1 Rate</b>	<b>Res. EAS Charge</b>
Bushnell	\$ 19.25	\$ -
Dalton	\$ 19.25	\$ -
Dix	\$ 19.25	\$ -
Gurley	\$ 19.25	\$ -
Lodgepole	\$ 19.25	\$ -

<sup>(1)</sup> Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Nebraska Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

<sup>(2)</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

3. LOCAL SERVICES

3.1 Local Exchange Telephone Service – Basic Service Rates

These monthly rates apply to all subscribers of the Company. This rate covers the provisions of network access to a local customer location, and entitles the customer to local calls (without toll charge) to all local stations connected to a central office of the exchange, or to all local extended local service area where comprised of more than one exchange. Service may be temporarily suspended at the customer's request under a Number Reserve Rate. (N)  
(N)

	<u>Monthly Rate</u>
Business Access Line	\$29.95
Residence Access Line	\$19.25

3.11 Lifeline Service

The Lifeline Service (Lifeline) program, sponsored by the FCC, is a program Designed to maintain and preserve universal service by providing a reduction in the price of basic residential local exchange service to qualifying low-income customers.

a. General

1. Lifeline is a federally funded reduction of the subscriber line charge (SLC) and a reduction of local service charges. Eligible applicants will receive a reduction of \$9.25 on their local telephone bill.
  - (a) Lifeline customers will also receive additional Lifeline Service reductions in intrastate local service of \$3.50.
2. Local service for Lifeline customers may not be disconnected for non-payment of toll charges.
  - (a) Toll Restriction Service will be provided to Lifeline customers at no charge.
  - (b) Lifeline customers are not required to accept Toll Restriction Service as a condition to avoid disconnection of local service for non-payment of toll.

- (c) Lifeline customers are not required to pay a deposit in order to obtain local service if the customer voluntarily elects installation of Toll Restriction Service.
3. Partial payments from Lifeline customers will be applied first to local service charges and then to toll charges.
  4. Lifeline customers will not be denied re-establishment of service on the basis that the customer was previously disconnected for non-payment of toll charges.
  5. Lifeline will not be furnished on a Foreign Exchange service arrangement.

b. Eligibility Requirements

1. Lifeline will be provided for one (1) telephone line per household, at the customer's principal place of residence who have only one local exchange access line to his/her residential premises or dwelling place<sup>1</sup>. Verification of this requirement will be through a certification. (T)
2. Applicant has not been claimed as a dependent for Federal Income Tax Purposes, unless the applicant is more than sixty (60) years old.
3. Show that he/she is currently a recipient of benefits from one of the following public assistance programs or meets the income based eligibility criteria: (N)

-Federal Public Housing Assistance  
-Food Stamps  
-Low Income Home Energy Assistance Program (LIHEAP)  
-Medicaid  
-Supplemental Security Income (SSI)  
-National School Lunch Program  
-Temporary Assistance for Needy Families  
-Income Based: Household gross monthly income that does not exceed 135% of the Federal Poverty Guidelines. (N)

Individuals choosing this option must obtain and provide to the Company a copy of a valid identification card or the appropriate Documents that are issued to them by the agency administering the program.

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<sup>1</sup> A residential premises or dwelling place is that location where a customer resides, even if such residential premises or dwelling place is only a single room. Lifeline will not be provided if the customer has access to other local exchange telephone service within the residential premises or dwelling place, provided/owned by himself/herself or owned/provided by others. If, however, it can be determined by the Telephone Company that access to other existing local exchange telephone service owned/provided by others is virtually denied, or is inaccessible to the customer, then Lifeline Service will be provided.

c. Certification

1. The customer will certify eligibility for Lifeline Service. Recertification is required annually, at any time the qualifying criteria for the customer changes or upon request by Company.

Customer cannot receive Lifeline support from multiple providers.

Recipients of Lifeline Service must notify the Company when they no longer qualify for Lifeline Service. Upon receipt of the notification, the the Telephone Company will discontinue Lifeline Service.

If the Company discovers that conditions exist that disqualify the recipient of Lifeline Service, local service will be billed at the full rate. The customer will be billed retroactively either to the date Lifeline Service commenced or the date the recipient no longer qualified for the service, not to exceed 12 months.

3.12 Telecommunications Relay System (TRS)

Enables deaf, hard-of-hearing, or speech impaired persons who use Text Telephone (TT) or similar devices to communicate freely with the hearing population not using TT and vice versa. A customer will be able to access the state provider to complete such calls. The Company shall add the surcharge to each subscriber's local telephone bill.

Pursuant to Neb.Rev.St. §86-313, the Commission shall determine a surcharge on each telephone subscriber to fund the TRS. Such charge may be adjusted on July 1 of each year. The surcharge is used to fund the TRS and the Nebraska Specialized Telecommunications Equipment Program for the coming year. The surcharge shall be billed to each access line in Nebraska. The surcharge shall only be collected on the first one hundred telephone access lines per subscriber.

	<u>Monthly Charge</u>	
Per Access Line	\$ 0.02	(R)

3.13 Nebraska Universal Service Fund (NUSF)

On January 13, 1999, the Nebraska Public Service Commission authorized the implementation of the Nebraska Universal Service Fund to ensure that all customers in Nebraska have access to affordable basic telephone service in a competitive market.

**Dalton Telephone Company**

**Study Area Code: 371537**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Dalton Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

**Dalton Telephone Company (SAC 371537)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly  
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions<sup>1</sup> to which the ETC newly began providing broadband service. In 2014, as Appendix C to its original Five-Year Network Improvement Plan, Dalton Telephone Company ("DTC") provided a list of all community anchor institutions to which it provided broadband service. Since that time, DTC has not begun providing any additional community anchor institutions with access to broadband service. Therefore, for calendar year 2014, DTC has no additional community anchor institution information to report.

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<sup>1</sup> The FCC has defined community anchor institutions in Section 54.5 of its Rules as "schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities."



**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**